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November 3, 2004

Stacy Charboneau
U.S. Department of Energy
Richland Operations Office (A5-11)
P.O. Box 550
Richland, WA 99352

Dear Stacy Charboneau:

Subject: Comments on *EE/CA for the Plutonium Finishing Plant Above-Grade Structures*

I support the choice of the recommended Alternative Four (Slab-To-Grade) in Section 6.0 of *Engineering Evaluation/Cost Analysis for the Plutonium Finishing Plant Above-Grade Structures*, DOE/RL-2004-05, Rev. 1, Re-Issue, September 2004. The use of ERDF, a lined waste disposal facility that can accept CERCLA and specific RCRA waste generated anywhere on the Hanford Site, is very important to me. Also, do the work now. Do not delay removal until after years of expensive S&M and costs have escalated, and when ERDF will most likely be closed.

Alternative Five (Entombment) is not an acceptable solution. Filling 234-5Z, 236-Z and 242-Z with concrete without thorough cleanout and demolition to grade would leave perhaps 6 kg of holdup more above ground level than Alternative Four. An above ground concrete structure would last only a miniscule fraction of the time necessary for entombed Pu-239 to decay to insignificant quantities, i.e., plutonium would be released to the environment in quantities hazardous to human health and the environment within a few tens to hundreds of years.

Alternative Six (Collapse and Cover) is at best a poor solution. It would leave perhaps 4 kg of holdup more above the surrounding ground level than Alternative Four. The RCRA compliant cap of Alternative Six would leave plutonium closer to potential release to the surface environment than at ERDF, which would place all waste below the surrounding ground level (up to 70 feet deep) followed by a final (e.g., RCRA compliant) cap.

Finally, the vault under 241-Z, particularly TK D-6 that has leaked in the past, should be investigated for leakage into the surrounding soil, and the 241-Z site be cleaned up to the Industrial-Exclusive standard during this work.

Sincerely,

Les Davenport

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